

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

DATE:

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SUBJECT: L.E. Carpenter Site - Wetland and Floodplain Reports

FROM:

William P. Lawler
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TO:

Pat Evangelista, Chief
Northern New Jersey Superfund Section II

We have reviewed the Wetlands Assessment Report and the Floodplain Delineation for the subject site for issues related to environmental resources, and offer the following comments:

Wetlands Assessment Report

- Data was only provided for three sampling points; as a result, we are unable to determine whether the assessment conforms to the methodology contained in the Federal Manual for Identifying and Delineating Jurisdictional Wetlands. The field sheets for the other sampling points should be provided for review.
- Wetland impacts are to be avoided or, if that is not possible, impacts must be minimized. Therefore, to complete the wetlands assessment, the report should also provide the approximate acreage of the mapped wetlands, estimates of the acreage and types of wetlands that may be capped/excavated, and a recommendation as to what mitigation measures are appropriate to compensate for the impacts to the wetlands.
- The scale of Figure 1 is not large enough for the figure to be useful. Specifically, Figure 1 is referenced on page 1 in regard to the site's location relative to Ross Road, Air Products and Chemicals, Inc., and Wharton Enterprises. These features are not identifiable on the map and it is even difficult to discern that the site is bordered by Washington Pond.
- Similarly, the scale of Figure 2 is also too small to depict the site's relationship to wetlands identified on the U.S. Fish and Wildlife Service's National Wetlands Inventory map.
- On Page 9, there is a statement which reads: "It should be noted that within the Morris County Soil Survey, soil mapping is based on 1971 aerial photographs; more recent development and remediation activity have decreased the areal extent of the Ridgebury and Whitman soils [hydric soils]."

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This statement gives the impression that, because previous remediation may have removed hydric soils, these soils (and presumably, associated wetlands) need not be considered further. However, if wetlands were associated with these soils, the areal extent of loss and/or disturbance should be estimated based upon existing information/reports, etc. Impacts to these lost/degraded wetlands should be considered in planning for the restoration of the site, regardless of whether they were disturbed prior to the January 1992 Wetlands Assessment. Appropriate mitigation for these wetlands losses should be determined.

- On page 10, the discussion of the herb layer in the palustrine forested wetland may be skewed by the fact that the delineation occurred in October and November. This could easily account for the "sparse herb layer." We recommend adding a statement which indicates that it is likely that the vegetation was sparse due to the timing of the delineation. As the text now reads, it gives the impression that "sparse" refers to the quality of this stratum.

Floodplains Delineation

- The text (page 3-1) claims that Area B on the floodplain map is "topographically elevated compared to the Rockaway River bed." The map, however, shows lower elevations in Area B (633 ft. above MSL) than in Area A (636, 634, and 639 ft. above MSL). Because Area A is reported to be within the 500-year floodplain, this apparent inconsistency needs to be resolved or explained.
- The site should be identified on the floodplain map.

At the request of the RPM, Jonathan Josephs, these comments were discussed with Christina Purcell of NJDEPE on 9/10/92. Please note that this review includes comments provided to us by the Marine and Wetlands Protection Branch, which also reviewed the Wetlands Assessment Report.

Thank you for this opportunity to comment. If you have any questions, concerning these comments or the information we have requested, please contact Susan Osofsky at x6677.

cc: R. Basso, 2ERRD-NJ
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